

### REMARKS

Claims 1- 21 are currently pending in this application. Claims 1-3, 6, 9, 10, 18 and 21 have been amended. No new matter has been added by these amendments. Applicants have carefully reviewed the positions presented in the Office Action and respectfully request reconsideration of the claims in view of the remarks presented below.

### Drawing Objections

The application was objected to because there was no drawing in the application. Applicant has submitted a proposed drawing of a figure 1 for the application. Support for each item shown in the drawings is found within the specification, as originally filed. In view of this drawing, Applicant believes the objection has been overcome.

### Claim Objections

Claims 2, 3, 6, 9 and 10 were objected for inconsistency terminology. Each of these claims has been amended to provide consistency terminology and thus the objections are believed to be overcome.

### Claim Rejections Under 35 U.S.C. §103

Claims 1-3, 4, 9-11, 14, 18 and 21 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,892,905 to *Brandt et al.* in view of U.S. Patent No. 6,167,253 to *Farris et al.*

*Brandt et al.* discloses an apparatus for providing a standardized graphical user interface for accessing many different application programs. (See column 3, lines 57-60.) This standard GUI is intended to eliminate the need for custom GUIs for each specific application and the associated inconvenience the end user experiences with having to learn numerous custom GUIs. (See column 3, lines 8-12, 45-53.) The apparatus includes an interface component mechanism having a template library which contains a wide variety of templates that interface with one or more application programs. Instead of accessing the software application directly, a user accesses a template. The template then causes the software application to perform a function and return data to the template. The template and data is then output to the web server and then to the web browser. (See column 14, lines 43 through column 15, line 44.)

As admitted by the examiner, the templates of *Brandt et al.* do not convert the state and function of separate components of the user interface of the software application into standard code that can be interpreted by the browser, nor do they transfer to the standard application in the requested format the data entered by the user and returned by the browser. *Farris et al.* is cited for disclosing this missing feature and is used as the secondary reference in the obviousness rejection.<sup>1</sup>

Applicant traverses this rejection on two grounds. First, *Farris et al.* does not teach the missing feature. Second, even if *Farris et al.* did teach the missing feature, there is no suggestion in either *Brandt et al.* or *Farris et al.* to make such combination and, in fact, the context within which the *Brandt et al.* apparatus is presented, actually discourages any such combination.

Regarding the first ground, *Farris et al.* discloses an information distribution system for use in transmitting audio data to the users of mobile cellular devices. As an initial matter, the teachings of *Farris et al.* relate little, if any, to user interfaces and are entirely unrelated to the creation of a user interface for a standard application in the window of a browser. This lack of relevance to the claimed invention is borne out by the disparate citations relied upon by the examiner in support of the rejection, as follows.

Column 19, beginning at line 36, states that the transceiver of the apparatus performs signal conversion as required based on the signal formats utilized by the cellular network and the signal formats used by the apparatus. This signal conversion is a cellular data signal conversion which has nothing to do with the claimed invention, which includes the conversion of the state and function of separate components of a user interface of a standard application into standard code for transmission to, and display at, a browser.

Column 28, beginning at line 34, states that the call delivery process is a standard function of an interface specification which allows for a cellular system which receives a call

---

<sup>1</sup> For purposes of clarification and not necessarily in response to the claim rejections, independent claims 1, 18 and 21 have been amended to recite that the standard code representing the state and function of the separate components of the user interface are transmitted to the browser for display as the user interface, and that the data entered by the user at the user interface is transferred to the standard application.

attempt to one of its mobile telephones to deliver the call to another cellular system which is providing cellular service to the mobile telephone using the standard interface protocol. Again, this signal conversion is a cellular data signal conversion which has nothing to do with the claimed invention which includes the conversion of the state and function of separate components of the user interface of a standard application into standard code for transmission to, and display at, a browser.

Column 40, line 51 states that a typical home page returned to a browser is formatted using HTML. This has nothing to do with the claimed invention which includes the transfer of data from a user interface at a browser to a standard application.

In view of the foregoing, Applicant submits that *Farris et al.* fails to teach any element of the claimed invention. Thus, the use of *Farris et al.* in the obviousness rejection is misplaced.

Regarding the second ground, *Brandt et al.* teaches the use of templates, separate and apart from software applications, as a way of providing a standard GUI across various software application which would otherwise have different GUIs. In view of this core teaching of *Brandt et al.*, there would be no motivation or reason to modify the system of *Brandt et al.* to produce the claimed invention, because doing so would frustrate the purpose of the *Brandt et al.* system. Specifically, the claimed invention integrates software modules into the separate software applications and these integrated modules allow for the creation of the unique user interface of the software application at a remote browser. *Brandt et al.*, on the other hand, advocates the abandonment of unique user interfaces for software applications in favor of a standard GUI provided by templates independent of the software application.

In view of the foregoing, Applicant submits that neither *Brandt et al.* nor *Farris et al.*, either alone or in combination, teach or suggest the invention claimed in independent claims 1, 18 and 21. Accordingly, Applicant requests reconsideration of the §103 rejections of claims these claims and their respective dependent claims.

Claims 5, 15-17 and 18-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Brandt et al.* in view of *Farris et al.* and further in view of U.S. Patent No. 6,507,856 to *Chen et al.*

In view of the foregoing analysis of independent claims 1, 18 and 21 in view of *Brandt et al.* and *Farris et al.*, Applicant believes that the rejections under §103 are rendered moot as dependent claims 5, 15-17 and 18-20 depend from allowable independent claims.

CONCLUSION

Applicant has made an earnest and bona fide effort to clarify the issues before the Examiner and to place this case in condition for allowance. Therefore, reconsideration and allowance of Applicant's claims 1-21 are believed to be in order and an early Notice of Allowance to this effect is earnestly solicited.

Respectfully submitted,

FULWIDER PATTON LEE & UTECHT, LLP

By: \_\_\_\_\_

David S. Sarisky

Registration No. 41,288

Howard Hughes Center  
6060 Center Drive, Tenth Floor  
Los Angeles, CA 90045  
Telephone: (310) 824-5555  
Facsimile: (310) 824-9696  
Customer No. 24201

42779.1